

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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JANE DOE, LUKE LOE, RICHARD ROE, and MARY :
MOE, individually and on behalf of all others similarly :
situated, :

Plaintiffs, :

v. :

THE TRUMP CORPORATION, DONALD J. TRUMP, in :
his personal capacity, DONALD TRUMP, JR., ERIC :
TRUMP, and IVANKA TRUMP, :

Defendants. :
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No. 1:18-cv-09936 (LGS)

DECLARATION OF CYNTHIA CHEN PURSUANT TO LOCAL RULE 1.4

I, Cynthia Chen, declare and state as follows:

1. I am an associate at the law firm of Spears & Imes LLP, counsel for Defendants The Trump Corporation, Donald J. Trump, in his personal capacity, Donald Trump, Jr., Eric Trump, and Ivanka Trump. Pursuant to Local Civil Rule 1.4, I respectfully request leave of the Court to withdraw my individual appearance as counsel for Defendants.

2. I am associated with the law firm Spears & Imes LLP. Joanna C. Hendon, the partner responsible for this matter, has departed Spears & Imes LLP and is now a partner at Alston & Bird LLP. Ms. Hendon has represented Defendants in this action since January 14, 2019 and will continue to do so.

3. Because Ms. Hendon will continue to represent Defendants, this withdrawal will not affect this action in any way, including the posture of the case. Nor will this withdrawal prejudice Plaintiffs.

4. Neither Spears & Imes LLP nor I is asserting any retaining or charging lien on Defendants.

5. I am causing this motion, including all of the papers submitted with the motion, to be served on Defendants and all parties.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: June 10, 2020
New York, New York

By: /s/ Cynthia Chen
Cynthia Chen